

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

BRET T. CULVER, :
:
Plaintiff :
:
v. : **No. 1:01-CV-0904**
: **(Judge Kane)**
COMMONWEALTH OF :
PENNSYLVANIA, et al., :
: **(Electronically Filed)**
Defendants :

**DEFENDANTS' RESPONSE TO PLAINTIFF'S
MOTION TO COMPEL DISCOVERY**

EXHIBIT C

Defendant Mooney's Responses to First Set of Interrogatories

DATE: September 29, 2003

ct
4/3

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

BRET T. CULVER, :
:
Plaintiff :
:
v. : **No. 1:01-CV-0904**
: **(Judge Kane)**
T. E. MIKNICH, et al., :
:
Defendants :

**DEFENDANT MOONEY'S RESPONSES
TO PLAINTIFF'S INTERROGATORIES**

Defendant, Vincent Mooney, through his attorneys, respond to plaintiff's interrogatories as follows:

1. What is your full name and address ?

ANSWER:

Vincent Mooney
State Correctional Institution at Mahanoy
Frackville, Pennsylvania

2. Have you been employed as a D.O.C. employee during the time period of December of 1999 through February 2002 ?

ANSWER: Yes.

3. On the following dates of September 5, 2000 through September 22, 2000 were you on duty as an employee of the D.O.C at the S.C.I. at Mahanoy?

ANSWER:

September 5- 8, 2000, I was not at S.C.I. Mahanoy. September 11-15, and September 18-22, 2000 I was on duty at S.C.I. Mahanoy.

4. If yes to # 3,

- (a) Cite each day you reported for duties at the facility;
- (b) Cite what time of day you started your duties each day present;
- (c) Cite what time of day you finished your duties each day present;

ANSWER:

(a) See response to Interrogatory No. 3.

(b) 8:00 A.M.

(c) 4:00 P.M.

5. During your employ at S.C.I. Mahanoy facility, have you ever received or reviewed any reports, complaints, or correspondence documents from the plaintiff, or from any other person on relevant or related issues or subject matter out-lined in this Complaint Action 1:01-CV-00904 ?

ANSWER:

Yes.

6. If yes to # 5,

- (a) Cite dates of documents, notices, correspondence, reports directed to your authority by plaintiff or other persons, including the subject matter of each document, report, correspondence, and notice to your authority;
- (b) Cite your responses and/or action taken on issue of notification to your authority, and on what dates responses or actions were taken;
- (c) Cite any protection or relief established or enforced by your authority for the plaintiff, including dates of any and all action taken on any issue presented or directed to your authority for attention.

ANSWER: OBJECTION. The defendant objects to this interrogatory as overbroad and as seeking documents that are privileged. Without waiving that objection, see Exhibit "A" attached.

7. At any time during the time period of September 5, 200 [sic] through September 22, 2000 did you at any time (working/non-working) speak with or communicate with defendant Kevin Kane concerning the plaintiff (in any manner), conferring/advising/alluding any thought, implication or action to Kevin Kane.

ANSWER: OBJECTION. The defendant OBJECTS to this interrogatory as vague and overbroad and irrelevant to the complaint. Without waiving that objection, see Exhibit "A" attached.

8. If yes to # 7, cite dates and subject matter of any and all interactions (verbal, written or other) made or conveyed to defendant Kevin Kane.

ANSWER: OBJECTION. The defendant OBJECTS to this interrogatory as vague and overbroad and irrelevant to the complaint. Without waiving that objection, see Exhibit "A" attached.

9. At any time during your employ by the D.O.C. have you ever been cited, reprimanded, re-assigned or re-located pursuant to reports, complaints, incidents or allegations of misconduct and/or violations against others filed on your person (alleged or confirmed)?

ANSWER: OBJECTION. The defendant OBJECTS to this interrogatory as overbroad and irrelevant to the complaint. Without waiving that objection, No.

10. If yes to # 9, cite dates and describe what incidents or violations you were cited or reported for.

ANSWER: N/A.

11. During your term of employment at S.C.I. Mahanoy have you ever received communications of orders/advice/recommendations from affiliate official personnel (staff) or any official authority of the D.O.C. pertaining to the plaintiff on any subject matter during the plaintiff's detainment at the S.C.I. Mahanoy facility ?

ANSWER: OBJECTION. The defendant OBJECTS to this interrogatory as vague, confusing, overbroad and irrelevant to the complaint.

12. If yes to # 11,

- (a) Cite name and title of correspondence;
- (b) Cite date and subject matter of each correspondence/communication;
- (c) Produce discovery of any and all record documentation of information received related to or pertaining to plaintiff

ANSWER: N/A.

13. During your term of employment at the S.C.I. Mahanoy facility have any other employees affiliated to your authority prepared and/or filed into record any information, report, allegation, comment, statements recommendations, or evaluations on the plaintiff incorporating assistance, input or information from your authority 12-01-1999 through February of 2000?

ANSWER: **OBJECTION.** The defendant OBJECTS to this interrogatory as vague, confusing, overbroad and irrelevant to the complaint.

14. If yes to # 13,

- (a) Cite name, badge or identification number, and present address of each person involved in any said document/report;
- (b) Cite name, badge or identification number, and present address of the persons for whom each document/communication/report was prepared and directed;
- (c) The date, time and place where each document/report/communication was prepared;
- (d) Explain the subject matter contents of each document/report/communication.

ANSWER: OBJECTION. The defendant OBJECTS to this interrogatory as vague, confusing, overbroad and irrelevant to the complaint.

15. Have you ever reviewed, had possession of, or had knowledge of any video security monitoring of the day events of 10-12-00 (R.H.U. L-5 D-Pod), and 01-11-02 (Medical Building Lobby area) ?

ANSWER: No. In addition, the defendant OBJECTS to this interrogatory as it seeks information concerning 01-11-02, which is irrelevant to plaintiff's complaint.

16. Have you at any time referred to or reviewed any video monitoring recordings of 10-13-00 (L-5 D-Pod), or 01-11-02 (Medical Building Lobby area), and have you has any involvement with documentation, storage, or decisions concerning the record, storage, or documentation of video security monitoring recordings, namely in relation or concern to any and all tapes/recordings of the dates 10-13-00 (L-5 D-Pod), or 01-11-02 (Medical Building Lobby area)?

ANSWER: OBJECTION. The defendant OBJECTS to this interrogatory as vague, confusing, overbroad and irrelevant to the complaint. Without waiving that objection, the defendant did not review any videos of L-5 D-Pod for October 13, 2000, nor was he involved in the storage of the video security monitoring recordings.

17. If yes to # 16,

(a) Explain any input, action, or involvement you have had concerning to or relative to the record, documentation, storage, treatment or disposition of any and all video security monitoring tapes/recordings for 10-13-00 (L-5 D-Pod), and 01-11-02 (Medical Building Lobby area) ?

(b) Cite any persons involved or knowledgeable of any video security monitoring recordings for the days events of 10-13-00 (L-5 D-Pod), and 01-11-02 (Medical Building Lobby area)?

ANSWER: **OBJECTION.** The defendant OBJECTS to this interrogatory as vague, confusing, overbroad and irrelevant to the complaint. Without waiving that objection, the defendant did not review any videos of L-5 D-Pod for October 13, 2000, nor was he involved in the storage or disposition of the video security monitoring recordings.

18. Was your authority or department notified by any person or official authority to retain or discard (erase/destroy) any video security monitoring tapes or recordings for the dates of 10-13-00 and 01-11-02?

ANSWER: **OBJECTION.** The defendant OBJECTS to this interrogatory as vague, confusing, overbroad and irrelevant to the complaint. Without waiving that objection, no.

19. If yes to #18, cite name, title badge or identification number and present address of any persons, implicated, or associated with any knowledge or facet to care, treatment, documentation, storage, record of any and all video security monitoring

tapes/recordings for the dates 10-13-00 (L-5 D-Pod), and 01-11-02 (Medical Building Lobby area).

ANSWER: OBJECTION. The defendant OBJECTS to this interrogatory as vague, confusing, overbroad and irrelevant to the complaint.

20. Disclose discovery of all video security monitoring tapes/recordings for the dates of 10-13-00 (L-5 D-Pod), and 01-11-02 (Medical Building Lobby area).

ANSWER: No video tapes exist for 10-13-00 (L-5 D-Pod), and 01-11-02 (Medical Building Lobby area). The Medical Building Lobby area is not videoed by the video security monitoring system.

21. Cite name and address or otherwise identify any person who, to your knowledge or the knowledge of your agents or attorneys, purport to have knowledge or involvement of actions or facts relevant to the issues or subject matter described in these interrogatories.

ANSWER: OBJECTION. The defendant OBJECTS to this interrogatory as vague, overbroad and irrelevant to the complaint. Without waiving that objection, see documents attached as Exhibit "A" as containing the names of individuals who have knowledge concerning the allegations contained in plaintiff's complaint.

22. Do you, your attorneys, or any other person employed by the D.O.C. have possession or knowledge of any documents, records, reports made in the

ordinary course or business, other printed or documentary material, photographs, drawings, video, information, or other tangible objects that are relevant/related to the subject matter described in these interrogatories.

ANSWER: OBJECTION. The defendant **OBJECTS** to this interrogatory as vague, overbroad and irrelevant to plaintiff's claim. Without waiving that objection, at this the defendants have identified those persons and documents attached as Exhibit "A".

23. If yes to # 22, state:

- (a) Cite name and description of each item;
- (b) Cite name and address of each person who made, prepared, or took such item;
- (c) Cite name and address of the present custodian of each such item;
- (d) Cite date, time and place where each item was made/formulated/prepared/taken;
- (e) Explain method by, and purpose for which each item was made/prepared/taken;
- (f) Explain manner in which each such item is relevant tot he issues/conduct/incident described in theses interrogatories ?

ANSWER: OBJECTION. The defendant **OBJECTS** to this interrogatory as vague, overbroad and irrelevant to plaintiff's claim. Without waiving that

objection, at this the defendants have identified those persons and documents attached as Exhibit "A".

23. Do you, any other employees, your attorneys have any knowledge of any item mentioned or described being altered removed, destroyed, erased, or lost in any manner?

ANSWER: OBJECTION. The defendant OBJECTS to this interrogatory as vague, overbroad and irrelevant to plaintiff's claim. The defendant has no idea what plaintiff is referring to as "item mentioned or described."

24. If yes to # 23,

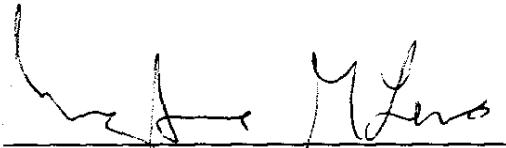
- (a) Explain;
- (c) Cite instances, items, dates;
- (d) Cite names and address of persons involved or who have knowledge relevant events, items facts.

ANSWER: See Response to Interrogatory No. 23.

Respectfully submitted,

D. MICHAEL FISHER
Attorney General

By:


MARYANNE M. LEWIS
Deputy Attorney General

SUSAN J. FORNEY
Chief Deputy Attorney General
Chief, Litigation Section

Office of Attorney General
15th Flr., Strawberry Sq.
Harrisburg, PA 17120
FAX: (717) 772-4526
Direct Dial: (717) 787-9719
DATE: April 3, 2002

SCI MAHANOY SUPT OFF
FILE No.587 04/02 '02 13:27

5706213138

OFFICE OF ATTY. GENERAL

04/02/02 15:59 :02/03 NO:678
FAX:724526 PAGE 51/ 51IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

BRET T. CULVER, :
:
Plaintiff :
:
v. : **No. 1:01-CV-0904**
: **(Judge Kane)**
T. E. MIKNICH, et al., :
:
Defendants :

VERIFICATION OF VINCENT MOONEY

I, VINCENT MOONEY hereby states, he has read the responses to plaintiff's interrogatories, and that the facts set forth therein are true and correct to the best of his knowledge, information, and belief.

4/2/02
DATE



VINCENT MOONEY

MOONEY - EXHIBIT "A"

NY

FORM DC-141 PART I COMMONWEALTH OF PENNSYLVANIA

Rev. 6-84 MISCONDUCT REPORT □ OTHER DEPARTMENT OF CORRECTIONS

A 212770

DC Number DD-3483	Name Culver, Brett	Institution SCI-MAH	Incident Time 24 Hr. Base 1515	Incident Date 9/5/00	Date of Report 9/18/00
Quarters RHU	Place of Incident Security Office				
OTHER INMATES OR STAFF INVOLVED OR WITNESSES (CHECK I OR W)					
DC Number	Name	I	W	DC Number	Name
Staff	COI Brennan			Staff	Superintendent Shannon
Staff	COI Engle				
Staff	COI Mikovich				
MISCONDUCT CHARGE OR OTHER ACTION A. Class # 15. Threatening an Employee or their family with bodily harm.					
<p>STAFF MEMBER'S VERSION On September 5, 2000 Superintendent Shannon received a Request Slip from DD 3483 Culver. In the Request Slip inmate Culver alleged that CO Mikovich was harassing and stalking him. Culver further stated "I cannot be held accountable for my actions on my part that might occur related to these situations". On 9/11/00 I attempted to interview inmate Culver concerning his threatening statement, Culver refused to cooperate and explain his statement, therefore his statement is considered a threat to CO Mikovich. The difference in the original date of Incident and Report date was due to this reporter being out of the institution until 9/11/00. Misconduct A212769 was dismissed without prejudice resulting in a new date of Report of 9/18/00.</p>					
<p>IMMEDIATE ACTION TAKEN AND REASON CONTINUE CONFINEMENT in the L-5 pending further action by the Hearing Examiner.</p>					
PRE-HEARING CONFINEMENT					
IF YES					
<input type="checkbox"/> YES	TIME N/A	DATE N/A	<input checked="" type="checkbox"/> REQUEST FOR WITNESSES AND REPRESENTATION <input type="checkbox"/> INMATE'S VERSION		
REPORTING STAFF MEMBER Moore, Vincent F. Intelligence Captain		ACTION REVIEWED AND APPROVED BY COI B3gn		DATE AND TIME INMATE GIVEN COPY 9-18-00 1915	
YOUR HEARING MAY BE SCHEDULED ANY TIME AFTER DATE 9-20-00 TIME 0800			<input checked="" type="checkbox"/> Misconduct Category <input type="checkbox"/> CLASS 1 <input type="checkbox"/> CLASS 2		Signature of Person Serving Notice COI Mechi
NOTICE TO INMATE					
<p>You are scheduled for a hearing on this allegation on the date and the time indicated or as soon thereafter as possible. You may remain silent, if you wish. Anything you say will be used against you both at the misconduct hearing and in a court of law if this matter is referred for criminal prosecution. If you choose to remain silent, the hearing committee/examiner may use your silence as evidence against you. If you indicate that you wish to remain silent, you will be asked no further questions. If you are found guilty of a Class 1 misconduct, any pre-release status you have will be revoked.</p>					

DC-141

PART II B

COMMONWEALTH OF PENNSYLVANIA

Rev. 6-84

DISCIPLINARY HEARING REPORT

DEPARTMENT OF CORRECTIONS

DC Number <u>003483</u>	Name <u>Culver</u>	Institution <u>SCIMATH</u>	Hearing Date <u>9-22-00</u>	Hearing Time <u>1040</u>	No. from Part I <u>A212770</u>
INMATE	<input type="checkbox"/> Guilty	<input type="checkbox"/> No Plea	Verdict	<input checked="" type="checkbox"/> Guilty	
PLEA	<input checked="" type="checkbox"/> Not Guilty	<input type="checkbox"/> Other		<input type="checkbox"/> Not Guilty	

CHARGES *Att 15. Threat - not fit* HEARING ACTION

FINDINGS OF FACT, VERDICT, AND SANCTIONS IMPOSED

INDINGS OF FACT, VERDICT, AND SANCTIONS IMPOSED

Culver submits a resumé stay essentially that he did not see the attached copy of the request slip. See did make the statement that "I cannot be held responsible for any action on my part that might occur related to this situation...". ~~Good to~~ But he does not see this as a threat.

I find from the Staff report over Coker's level that the statement he authorised in the ~~other~~ Staff report slip, that he was not be held responsible for ~~any~~ other ~~any~~ action on his part, as a that he staff. I find he was not mentioned as a that. And his guilty of the thirty chg.

Santi: 90 f DC
M. 9-11-66

9-11-00

10

12-9-00

YES NO The inmate has heard the decision and has been told the reason for it and what will happen.

YES NO The circumstances of the charge have been read and fully explained to the inmate.

YES NO The opportunity to have the inmate's version reported as part of the record was given.

YES NO The inmate has been advised that within 15 days a request for a formal review may be submitted and that this request must contain specific reasons for the review.

~~introduction~~
see also
SEE APPENDICES

NAME(S) OF HEARING EXAMINER/COMMITTEE
(TYPED OR PRINTED)

Hearing Report and all appended information must be signed. Signature indicates finished report with appendices.

SIGNATURE OF HEARING EXAMINER/COORDINATOR

DC-141 PART II A
Rev. 6-84
INMATE REQUEST FOR
REPRESENTATION AND WITNESSES

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF CORRECTIONS

DC Number DD3483	Name CULVER, BRIET	Institution SCI MAH	Date 9-18-00	Number as on Part I A012770
----------------------------	------------------------------	-------------------------------	------------------------	---------------------------------------

You have been charged with a misconduct. You may request assistance and/or witnesses to appear at your hearing by completing the section(s) below. *With Assistance by Attorney/Case involves official criminal intent.*

In order to have assistance or witnesses at your hearing, you must complete this form and present all copies to one of your housing officers no later than 9:00 a.m. the first working day after you receive notice of the misconduct.

Assistance: I do not request assistance
 I request assistance by Kathy R. Stuber Esquire
 (The person requested must be willing to assist you)

PA. Institutional Law Project
924 Cherry St.
Philadelphia PA.

Witnesses: You may request witnesses in accord with DC-ADM 801. State the relevance and importance of the testimony the witness will give.

DO NOT WRITE IN THIS SECTION
For Use by Hearing Examiner

Witness permitted?

If not, why not?

If Inmate
1. Name of Witness: No. Quarters
Original Document (R. Shawen 9-5-00) Stamp Dated to V. Mooney Office receipt
Why is this person's testimony relevant and important?
V. Mooney rendering of statement in #A212770 is altered and not correct to the original text. Also V. Mooney twists this partial statement out of the context present in the original Office Date Stamp for Evidence.

Institutions

If Inmate
2. Name of Witness: No. Quarters
Work Attendance Tracking Record for V. Mooney
Why is this person's testimony relevant and important?
V. Mooney enters (implies) evidence by testimony in report that he had not been at this institution 9-5-00 to 9-11-00 for violation, that this charge could not be written-up (outside his authority and presence)
Whomever was V. Mooney's replacement during absence.

If Inmate
3. Name of Witness: No. Quarters
Whomever was in charge of V. Mooney's duties
Why is this person's testimony relevant and important?
To explain why nobody at this Prison absence 9-5-00 could find any reason, or could not take action if this violation (alleged) existed. And why no violation was found by anyone for the 6 days (six days) V. Mooney alleges he was not at this institution.

BRIET Culver

Inmate's Signature

This section to be completed by Housing Officer only

Received completed form 045 hours 9-19-00
Time Date

CO HENDERSON / Henk
Housing Officer's Signature


Hearing Examiner's Signature

K. Shannon (Superintendent) did not find any violation in document 9-5-00. V. Mooney did not charge me with #15 because document 9-5-00 was in violation, I was charged with the alleged violation because I ~~would~~ ~~wouldn't~~ speak about information V. Mooney wanted. I was charged because I ~~would~~ ~~would not~~ do what

DC-141 PART II C

Rev. 6-84 HEARING SUPPLEMENT
INMATE VERSION AND WITNESS STATEMENTSCOMMONWEALTH OF PENNSYLVANIA V. Mooney wanted me to do
DEPARTMENT OF CORRECTIONS Document R. Shannon 9-5-00
is not in violation, and that

15 is no documented threat to Mooney

DC Number Name Institution No. from PART I
DD-3483 Culver, BRETT SCI-MAH A-212770

INMATE'S VERSION

Statement of allegation is a isolated partial of a statement being twisted out of context to which it was presented. Also, this isolated partial being twisted out of context has been ALTERED from its original text, as it is rendered in #A212770. Even out of context this isolated partial implies no threat to anyone. In context presented in the two form documentation sent to R. Shannon 9-5-00, this document was a Proclamation. Due to Administrative hostilities and refusal to address violations being committed against my person, I Proclaimed, as to the context, that I am not responsible for any of the issues or situations I have been forced to seek relief for or resolution to. And regardless of the Administrative Official threats to stop pursuing these issues of complaint, I am not accountable (or responsible) for any actions on my part or efforts to secure relief. "I" am not responsible for these situations or violations being committed against "me"! (I am not "accountable") I also Proclaimed that because of Administrative Corruption, retaliation, and refusal to address/Process these issues, I would not be submitting anymore issues to the authority of this Administration.

Superintendent R. Shannon received this documentation (for record) and sent a copy to (?) to have the ISSUES OF COMPLAINT investigated. There was no "alleged Threat" by Superintendent R. Shannon concerning the document. Superintendent R. Shannon is in a position and knowledgeable enough to know if a rule or regulation had been violated. (And he would have had me charged immediately ^(to be investigated) ~~had there been a violation~~ 9-5-00.) But no action was taken because no rule or regulation had been violated, nor was there any Threat made in 9-5-00. Vincent Mooney did not ask me anything about a Threatening Statement as he testifies in his report. V. Mooney was enraged because I immediately told him I had nothing to say to this Administration on these issues. As Proclaimed in the Document, reasons included) V. Mooney was asking about names of employees referred to in the Document ONLY. I again told him I had nothing to say, all issues are being handled by outside agencies! In 9-5-00 V. Mooney had me sent to RHW. V. Mooney's report implies that Mooney is not capable of reporting this alleged charge, nor is anyone else down is the alleged abuse of 9-5-00 to 9-11-00. The Proclaimed Document itself was apparently written for Court, Actions taken, have nothing to do with these issues. ~~controversy~~ There is no intent

35 Q.

DC-135A		RECEIVED COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF CORRECTIONS SEP 07 2000	
INMATE'S REQUEST TO STAFF MEMBER		INSTRUCTIONS	
<i>Complete Items Number 1-7. If you follow instructions in preparing your request, it can be disposed of more promptly and intelligently.</i>			
1. TO: (NAME AND TITLE OF OFFICER)		R. Shannon	2. DATE 9-5-00
3. BY: (INSTITUTIONAL NAME AND NUMBER)		- Brett Culver DD-3483	4. COUNSELOR'S NAME Barsh
5. WORK ASSIGNMENT		6. QUARTERS ASSIGNMENT D-2B 22	
7. SUBJECT: STATE COMPLETELY BUT BRIEFLY THE PROBLEM ON WHICH YOU DESIRE ASSISTANCE. GIVE DETAILS.			
<p>The Harassment by Officer Miknich against me is well known among other employees at this facility. There are certain employees that inform me about conversations they have had, or heard about me from C.O.Miknich. *Today (9-5-00) I was told by one of these employees that Officer Miknich is actively seeking information concerning me from other employees on D-8. And this employee informed me that Officer Miknich was making improper statements in reference to me. This involves conspiracies and stalking. *All measures of security and protection have been denied by this Administration. I desperately tried to secure relief on these issues which has been denied. I tried to secure separation protection which has also been denied to this date. Everything I have tried to do to secure relief (protection from abuse) has been denied by this Administration "and your authority." This Administration has supported, facilitated, promoted, and endorsed all facets of harassment and hostilities against my person. I cannot be held responsible or accountable for any actions on my part that might occur related to these situations being deliberately forced on my person.</p>			
8. DISPOSITION: (DO NOT WRITE IN THIS SPACE)			
<p>Provide <u>names</u> to the Security Office. Give them something to work with and your accusations will be formally investigated as they have been previously.</p> <p>Also you most certainly <u>will be</u> held accountable for your actions.</p>			
<p>Dep. Petruccio cc: Major McGrady have his latest complaints investigated. Unit Mgr Chismar Adm Asst Dotter</p>		 7 Sep '00	
<input type="checkbox"/> TO DC-14 CAR ONLY		<input checked="" type="checkbox"/> TO DC-14 CAR AND DC-15 IRS	
STAFF MEMBER		DATE	

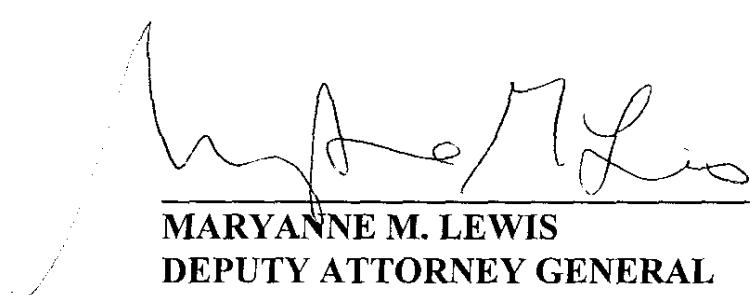
IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

BRET T. CULVER, :
: :
Plaintiff :
: :
v. : **No. 1:01-CV-0904**
: **(Judge Kane)**
T. E. MIKNICH, et al., :
: :
Defendants :
:

CERTIFICATE OF SERVICE

I, Maryanne M. Lewis, Deputy Attorney General, hereby certify that on this date I caused to be served the foregoing Defendant Mooney's Responses to Plaintiff's Interrogatories, by depositing a copy of the same in the United States mail, postage prepaid, in Harrisburg, PA., addressed to the following:

Brett T. Culver, #DD-3483
SCI-Mahanoy
301 Morea Rd.
Frackville, PA 17932


MARYANNE M. LEWIS
DEPUTY ATTORNEY GENERAL

DATE: April 3, 2002

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

BRET T. CULVER, :
:
Plaintiff :
:
v. : **No. 1:01-CV-0904**
: **(Judge Kane)**
COMMONWEALTH OF : **(Electronically Filed)**
PENNSYLVANIA, et al., :
:

CERTIFICATE OF SERVICE

I, Maryanne M. Lewis, Deputy Attorney General, hereby certify that on this date I caused to be served the foregoing **Defendants' Response to Plaintiff's Motion to Compel Discovery**, by depositing a copy of the same in the United States mail, postage prepaid, in Harrisburg, PA., addressed to the following:

**Brett T. Culver, #DD 3483
SCI-Mahanoy
301 Morea Rd.
Frackville, PA 17932**

s/Maryanne M. Lewis
MARYANNE M. LEWIS
DEPUTY ATTORNEY GENERAL

DATE: September 29, 2003